

40595 /16-14985

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Re: Sandra A. Biddle	:	
Debtor	:	Bky No. 16-14985
Seterus, Inc., as the authorized servicer for	:	
Federal National Mortgage Association	:	Chapter 13
("Fannie Mae"), creditor	:	
Movant	:	
Sandra A. Biddle		
William C. Miller		
Respondents		

STIPULATION IN SETTLEMENT OF MOTION FOR RELIEF

It is hereby stipulated by and between Jeniece D. Davis, Esquire of the Law Offices of Martha E. Von Rosenstiel, P.C., attorney for the movant Seterus, Inc., and David P. Spitofsky, Esquire, attorney for Sandra A. Biddle that the Automatic Stay pursuant to Section 362(e) of the Bankruptcy Code remain in effect, provided that the conditions set forth below are met.

As of the date of this Stipulation, Debtor is in arrears on post-petition payments in a total amount of \$8,705.24, which breaks down as follows:

DUE DATE	AMOUNT
August 1, 2016	\$1,100.27
September 1, 2016	\$1,100.27
October 1, 2016	\$1,095.95
November 1, 2016	\$1,095.95
December 1, 2016	\$1,095.95
January 1, 2017	\$1,095.95
February 1, 2017	\$1,095.95

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March 1, 2017	\$1,095.95
Attorney Fees	\$850.00
Filing Expense	\$176.00
Less Suspense	(\$1,097.00)
Total	\$8,705.24

Debtor hereby agrees to pay the arrears now due, as follows:

(1) **\$4,000.00** initial down payment due immediately upon the signing of this stipulation.

Said payment to be returned with this stipulation to:

**THE LAW OFFICES OF MARTHA E. VON ROSENSTIEL, P.C.,
649 SOUTH AVENUE
SECANE, PA 19018.**

(2) **\$1,880.16** per month for six (6) months **BEGINNING** April 2017 and continuing through September 2017. Each said installment includes payment for the regular monthly mortgage installment (which is subject to change) of \$1,095.95 and \$784.21 toward reduction of the arrears specified above. Payment shall be made by **CERTIFIED CHECK OR MONEY ORDER**, payable to:

**SETERUS, INC.
14523 SW MILLIKAN WAY, SUITE 200
BEAVERTON OR 97005**

Debtor further agrees that she will continue to make their regular Monthly mortgage payment (which is subject to change) of **\$1,095.95** beginning **October 2017** and continue to make their monthly trustee payments in a timely manner continuing through the life of the plan.

IN THE EVENT OF DEFAULT

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If any of the above payments is not made on or before the due date for one month, The Law Offices of Martha E. Von Rosenstiel, PC attorney for the movant will send the Debtor and the Debtor's attorney a **TEN (10) DAY NOTICE OF DEFAULT**. If the default **IS NOT** cured within **TEN (10) DAYS FROM THE DATE OF THE NOTICE**, The Law Offices of Martha E. Von Rosenstiel P.C., attorney for the movant, Seterus, Inc. will file a Certification of Default with the court and upon receipt of the Order granting the relief requested may proceed with the foreclosure action, giving Debtor full credit for all mortgage payments received.

IN THE EVENT OF CONVERSION

In the event that the Debtor should convert to a Chapter 7, the Debtor agrees that Martha E. Von Rosenstiel, P.C. will send the Debtor and the Debtor's attorney a **TEN (10) DAY NOTICE**. If after ten (10) days the Debtor has failed to contractually reinstate the account, including all late charges, and fees and costs, a Certification of Default will be filed with the court requesting that the Automatic Stay be lifted with regard to the premises located at **720 ANDERSON AVENUE, DREXEL HILL, PA 19026**.

The Debtor agrees that any Order granting Relief from the Automatic Stay will include a waiver of the F.R.B.P Rule 4001(a)(3) and that Movant, its successors and /or assigns may act upon the Order immediately.

It is agreed that Facsimile and /or electronic signatures are accepted as originals.

Signed and agreed to this 17th day of March, 2017

/s/Jeniece D. Davis, Esquire

Jeniece D. Davis, Esquire
Martha E. Von Rosenstiel, P.C.
Attorney for Movant


David B. Spitofsky, Esquire
Attorney for Debtors

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NO OBJECTION



William C. Miller
Trustee